

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**DANIEL BRYAN KELLY,**

**Plaintiff,**

**V.**

**RICKY OWENS, et. al.,**

## Defendants.

)  
)  
)  
)  
)  
)  
)  
)  
)

**) CIVIL ACTION NO. 2:05-cv-1150-T**

### MOTION FOR EXTENSION OF TIME

COME NOW Defendants Coosa County, Alabama Sheriff Ricky Owens and the Coosa County Commission, by and through their attorney of record, and request that the Court issue an Order giving these Defendants additional time to file a response to the Plaintiff's Complaint. In support thereof, Defendants state as follows:

1. Plaintiff filed the above-entitled action on December 6, 2005.
2. Sheriff Owens was served on December 15, 2005, and the Coosa County Commission was served on December 19, 2005.
3. Due to extenuating circumstances Defendants require additional time to file a response to the Plaintiff's Complaint.
4. The undersigned counsel has discussed the matter with the Plaintiff's attorney and has been informed that the Plaintiff has no objections to an extension of time.
5. Defendants therefore request that they be allowed until January 13, 2006, to file a response to the Plaintiff's Complaint.

**WHEREFORE, the above premises considered,** Defendants Coosa County, Alabama Sheriff Ricky Owens and the Coosa County Commission respectfully request that this Court issue an Order allowing them until January 13, 2006, to file a response to the Plaintiffs' Complaint.

Respectfully submitted this 3rd day of January, 2006.

**s/Gary L. Willford, Jr.**  
GARY L. WILLFORD, JR. – Bar No. WIL198  
Attorney for Defendants  
WEBB & ELEY, P.C.  
7474 Halcyon Pointe Road (36117)  
Post Office Box 240909  
Montgomery, Alabama 36124  
Telephone: (334) 262-1850  
Fax: (334) 262-1889  
E-mail: gwillford@webbeley.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 3rd day of January, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Richard J. Stockham, III, Esquire  
Stockham, Carroll & Smith, P.C.  
2204 Lakeshore Drive, Suite 114  
Birmingham, AL 35209

**s/Gary L. Willford, Jr.**  
OF COUNSEL